UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re:

CHAD M. ARCHER AND EMILY ARCHER fka EMILY ROSE dba AVERY EVER AFTER

Chapter 13 Bankruptcy No. 19-16854-MDC

Debtor.

PRAECIPE TO WITHDRAW **OBJECTION TO CONFIRMATION**

TD Auto Finance LLC, by its counsel, SCHILLER, KNAPP, LEFKOWITZ & HERTZEL, LLP as and for its Motion to Withdraw Objection to Confirmation, states the following as grounds therefor:

- 1. TD Auto Finance LLC is a secured creditor arising from the debtor's pre-petition purchase of a 2013 BMW 328i and filed an Objection to Confirmation on or about December 11, 2019.
- 2. Since the filing of the Objection, the debtor has filed an Amended Plan that satisfies TD Auto Finance LLC's objection and renders it moot. Based upon the filing of the Amended Plan, we hereby seek to withdraw the objection.

WHEREFORE, TD Auto Finance LLC respectfully requests that this objection be withdrawn from this calendar at this time.

DATED: March 10, 2020 TD Auto Finance LLC

By Its Counsel

/s/Martin A. Mooney, Esq. Martin A Mooney, Esq. BBO No. BBO#632599 SCHILLER, KNAPP, LEFKOWITZ & HERTZEL, LLP Office and P.O. Address: 950 New Loudon Road, Suite 109 Latham, New York 12110 Tel.: (518) 786-9069

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